

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RAW STORY MEDIA, INC., ALTERNET
MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, and OPENAI
HOLDINGS, LLC,

Defendants.

No. 1:24-cv-01514-CM

PLAINTIFF’S NOTICE OF SUPPLEMENTAL AUTHORITY

As noted in Plaintiff’s Reply in Support of their Motion for Leave to Amend Complaint (Jan. 21, 2025), ECF No. 127, Judge Rakoff had recently issued a bottom-line order in *The Intercept Media, Inc. v. OpenAI, Inc.*, No. 24-cv-01515 (S.D.N.Y. Nov. 22, 2024), ECF No. 122, denying OpenAI’s motion to dismiss a claim under 17 U.S.C. § 1202(b)(1) based on a complaint that large mirrors Plaintiff’s Proposed Amended Complaint in this case. Judge Rakoff has now issued an Opinion and Order explaining the reasons for the decision. That Opinion and Order is attached as Exhibit 1.

RESPECTFULLY SUBMITTED,

/s/ Stephen Stich Match

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**pro hac vice*

February 24, 2025